

# **SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT**

**Oxy USA Inc.**

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**ATTACHMENT A - DETAILED FACILITY PRINTOUT**

**ATTACHMENT B - INSIGNIFICANT ACTIVITIES OR EQUIPMENT**

**ATTACHMENT C - CURRENT ATCS AND PTOS**

**ATTACHMENT D - EPA AND PUBLIC NOTICE**

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT  
TITLE V APPLICATION REVIEW**

Project #: 970136  
Deemed Complete: May 7, 1997

**Engineer:** Pardorn, Nutprasasn  
**Date:** July 30, 2001

**Facility Number:** S-1326  
**Facility Name:** Oxy USA Inc.  
**Mailing Address:** PO Box 82576  
Bakersfield, CA 93380

**Contact Name:** Mike Glavin  
**Phone:** (661) 399-1745 Ext. 5

**Responsible Official:** Denny Brown  
**Title:** Manager – Heavy Oil Team

**I. PROPOSAL**

OXY USA Inc. (Occidental) is proposing that an initial Title V permit be issued for its heavy oil production facility located in Kern County. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for Final permit conditions.

**II. FACILITY LOCATION**

The source is located east of Interstate Highway 5 in Kern County, California.

**III. EQUIPMENT LISTING**

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

#### **IV. GENERAL PERMIT TEMPLATE USAGE**

The applicant is requesting to use the following model general permit Templates:

**A. SJV-UM-0-1 Facility-Wide Umbrella**

The applicant has requested to utilize template SJV-UM-0-1, Umbrella General Permit Template, for the entire facility. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

**B. SJV-WV-1-1 Series 1 Well Vents**

The applicant has requested to utilize template SJV-WV-1-1, Series 1 Well Vents for the following units: S-1326-26, '27, '28, and '35. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

#### **V. SCOPE OF EPA AND PUBLIC REVIEW**

Certain segments of the Final Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the Final permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's Final actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and Public review:

- Conditions 1 through 39 of the facility wide requirements for permit unit S-1326-0.
- Conditions 1 through 18 of the requirements for permit units S-1326-26, '27, '28, '35.
- Conditions 4 through 6 of the requirements for permit units S-1326-36-1.

## VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1100 – Equipment Breakdown<sup>1</sup> (Last Amended 12/17/92)

District Rule 1160 – Emission Statements<sup>1</sup> (Adopted 11/18/92)

District Rule 2010 – Permits Required<sup>1</sup> (Last Amended 12/17/92)

District Rule 2020 – Exemptions<sup>1</sup> (Last Amended 12/21/94)

District Rule 2031 – Transfer of Permits<sup>1</sup> (Last Amended 12/17/92)

District Rule 2040 – Applications<sup>1</sup> (Last Amended 12/17/92)

District Rule 2070 – Standards for Granting Applications<sup>1</sup> (Last Amended 12/17/92)

District Rule 2080 – Conditional Approval<sup>1</sup> (Last Amended 12/17/92)

District Rule 2520 – Federally Mandated Operating Permits, Sections 5.2, 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0<sup>1</sup> (Adopted 06/15/95)

District Rule 4101 – Visible Emissions<sup>1</sup> (Last Amended 12/17/92)

District Rule 4601 – Architectural Coatings<sup>1</sup> (Last Amended 12/17/92)

District Rule 8020, 8030, and 8060 – Fugitive Dust (PM<sub>10</sub>) Emissions<sup>1</sup> (Last Amended 4/25/96)

40 CFR Part 82 – Subpart F, Stratospheric Ozone<sup>1</sup>

40 CFR Part 61 – Subpart M, National Emission Standard for Asbestos<sup>1</sup> Kern County Rule 108.1 – Source Sampling<sup>2</sup>

District Rule 2520 – Federally Mandated Operating Permits, Sections 9.4.2, 9.5.2, and 9.13.2<sup>2</sup> (Adopted 06/15/95)

District Rule 4401 – Steam Enhanced Crude Oil Production Well Vents, excluding sections 5.1 and 5.2 for certain control systems (Last amended 01/15/98)<sup>2</sup>

District Rule 4402 – Crude Oil Production Sumps (Last amended 12/17/92)<sup>3</sup>

<sup>1</sup> The Umbrella General Permit Template addressed these requirements for all permit units at this facility.

<sup>2</sup> Model General Permit Template SJV-WV-1-1 addressed this requirement for units S-1326-26, '27, '28, '35, '36.

<sup>3</sup> Model General Permit Template SJV-SU-1-0 addressed this requirement for units S-1326-208.

## **VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES**

District New and Modified Stationary Source Review Rule

District Rule 1081 – Source Sampling (Amended 12/16/93)

District Rule 2520 – Federally mandated operating permits, Sections 9.4.2 and 9.5.2 (Adopted 6/15/95)

District Rule 4201 – Particulate Matter Concentration (Amended 12/17/92)

District Rule 4301 – Fuel Burning Equipment (Amended 12/17/92)

District Rule 4401 – Steam Enhanced Crude Oil Production Well Vents (Amended 1/15/98)

District Rule 4621 – Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Amended 6/18/98)

District Rule 4622 – Gasoline Transfer Into Motor Vehicle Fuel Tanks (Amended 6/18/98)

District Rule 4623 – Storage of Organic Liquids (Amended 12/17/92)

40 CFR 60, Subpart Ka Standards of Performance for Storage Vessels for Petroleum Liquids

40 CFR Part 60.18 General Control Device Requirements

40 CFR 63, Subpart HH Oil and Natural Gas Production MACT Standard

40 CFR Part 68 Chemical Accident Prevention Provisions

## VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102 Nuisance (Amended 12/17/99)

District rule 4305<sup>Ψ</sup> – Boilers, Steam Generators, and Process Heaters  
(Amended 12/19/96)

District Rule 4351<sup>Ψ</sup> – Boilers, Steam Generators, and Process Heaters – Reasonable Available Control Technology (Amended 10/19/95)

For this facility, condition 40 of the requirements for the facility wide requirements is based on the rules listed above and is not Federally Enforceable through Title V.

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<sup>Ψ</sup> All steam generators and process heaters subject to District Rules 4305 and 4351 at this facility are designated as dormant units, therefore, no evaluations are performed for those units and the requirements from these rules were not addressed.

## **IX. COMPLIANCE**

<b>A. Requirements Addressed by Model General Permit Templates</b>
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### **1. Facility Wide Requirements**

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-1 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements S-1326-0-1 as condition numbers 1 through 39 to assure compliance with these requirements.

### **2. Series 1 Well Vents**

The applicant is proposing to use general permit templates to address federally applicable requirements for the well vent units (S-1326-26, '27, '28, '35). Section IV of template SJV-WV-1-1 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for these permit units as condition numbers 1-18 to assure compliance with these requirements.

<b>B. Requirements Not Addressed by Model General Permit Templates</b>
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**1. New and Modified Stationary Source Review Rule (District NSR Rule)**

**1.1 STEAM GENERATORS AND PROCESS HEATERS**

**a. Natural Gas Fired Steam Generators and Heater Treaters (S-1326-9-7, '10-7, '12-7, '13-7, '31-8, '32-8, '33-7, '257-2)**

These units have been identified by permit conditions as being dormant units. These units will not be evaluated at this time. Refer to section IX.B.3 for a summary of these units.

**1.1 THERMALLY ENHANCED OIL RECOVERY SYSTEMS**

**a. TEOR with Well Vent Vapor Control System (S-1326-26-5)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide permit. This condition is based solely on CH&SC and therefore, it is not federally enforceable.
- Condition 2 from the PTO was included as condition 18 of the requirements for permit unit (S-1326-26-5).
- Condition 3 from the PTO was included in condition 5 of the requirements for permit unit (S-1326-26-5).
- Condition 4 from the PTO was included in conditions 7-11 and 15 of the requirements for permit unit (S-1326-26-5).
- Condition 5 from the PTO was included as condition 19 of the requirements for permit unit (S-1326-26-5).
- Condition 6 from the PTO was included as condition 20 of the requirements for permit unit (S-1326-26-5).
- Condition 7 from the PTO was included as condition 21 of the requirements for permit unit (S-1326-26-5).
- Condition 8 from the PTO was included as condition 22 of the requirements for permit unit (S-1326-26-5).
- Condition 9 from the PTO was included as condition 23 of the requirements for permit unit (S-1326-26-5).



- Condition 10 from the PTO was included as condition 24 of the requirements for permit unit (S-1326-26-5).
- Condition 11 from the PTO was included in condition 25 of the requirements for permit unit (S-1326-26-5). The fuel sulfur content test methods have been added.

**a. TEOR with Well Vent Vapor Control System (S-1326-27-8)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO was enforced by conditions 10 and 11 of the requirements for permit unit (S-1326-27-8)
- Condition 3 from the PTO was included as condition 18 of the requirements for permit unit (S-1326-27-8)
- Condition 4 from the PTO was enforced by conditions 19, 10, and 11 of the requirements for permit unit (S-1326-27-8)
- Condition 5 from the PTO was included as condition 20 of the requirements for permit unit (S-1326-27-8)
- Condition 6 from the PTO was included as condition 21 of the requirements for permit unit (S-1326-27-8)
- Condition 7 from the PTO was included as condition 22 of the requirements for permit unit (S-1326-27-8)
- Condition 8 from the PTO was included as condition 23 of the requirements for permit unit (S-1326-27-8)
- Condition 9 from the PTO was included as condition 24 of the requirements for permit unit (S-1326-27-8)
- Condition 10 from the PTO was included as condition 25 of the requirements for permit unit (S-1326-27-8)
- Condition 11 from the PTO was included as condition 26 of the requirements for permit unit (S-1326-27-8).
- Condition 12 from the PTO was included as condition 27 of the requirements for permit unit (S-1326-27-8). The

test method and frequency were added to assure and on going compliance.

- Condition 13 from the PTO was included as condition 28 of the requirements for permit unit (S-1326-27-8). The record retention time was changed from 2 years to 5 years for Title V compliance.

**a. TEOR with Well Vent Vapor Control System (S-1326-28-9)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 19 of the requirements for permit unit (S-1326-28-9).
- Condition 2 from the PTO was included as condition 20 of the requirements for permit unit (S-1326-28-9)
- Condition 3 from the PTO was included as condition 21 of the requirements for permit unit (S-1326-28-9)
- Condition 4 from the PTO was included as condition 22 of the requirements for permit unit (S-1326-28-9)
- Condition 5 from the PTO was included as condition 23 of the requirements for permit unit (S-1326-28-9)
- Condition 6 from the PTO was included as condition 24 of the requirements for permit unit (S-1326-28-9)
- Condition 7 from the PTO was included as condition 25 of the requirements for permit unit (S-1326-28-9)
- Condition 8 from the PTO was subsumed by condition 6 of the template requirements. This requirement is included as condition 6 of the requirements for permit unit (S-1326-28-9)
- Condition 9 from the PTO was included as condition 26 of the requirements for permit unit (S-1326-28-9)
- Condition 10 from the PTO was included as condition 27 of the requirements for permit unit (S-1326-28-9)
- Condition 11 from the PTO was included as condition 7 of the requirements for permit unit (S-1326-28-9).
- Condition 12 from the PTO was included as condition 28 of the requirements for permit unit (S-1326-28-9)
- Condition 13 from the PTO was included as condition 29 of the requirements for permit unit (S-1326-28-9)

- Condition 14 from the PTO was included as condition 30 of the requirements for permit unit (S-1326-28-9)
- Condition 15 from the PTO was included as condition 31 of the requirements for permit unit (S-1326-28-9)
- Condition 16 from the PTO was included as condition 32 of the requirements for permit unit (S-1326-28-9). The record retention time was changed from 2 years to 5 years for Title V compliance.
- Condition 17 from the PTO was included as condition 33 of the requirements for permit unit (S-1326-28-9)
- Condition 18 from the PTO was included as condition 34 of the requirements for permit unit (S-1326-28-9)
- Condition 19 from the PTO was included as condition 35 of the requirements for permit unit (S-1326-28-9).
- Condition 20 from the PTO was included as condition 36 of the requirements for permit unit (S-1326-28-9)
- Condition 21 from the PTO was included as condition 37 of the requirements for permit unit (S-1326-28-9)

**a. TEOR with Well Vent Vapor Control System (S-1326-35-3)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 18 of the requirements for permit unit (S-1326-35-3).
- Condition 2 from the PTO was included as condition 19 of the requirements for permit unit (S-1326-35-3)
- Condition 3 from the PTO was included as condition 7 of the requirements for permit unit (S-1326-35-3)
- Condition 4 from the PTO was included as condition 20 of the requirements for permit unit (S-1326-35-3)
- Condition 5 from the PTO was included as condition 21 of the requirements for permit unit (S-1326-35-3)
- Condition 6 from the PTO was included as condition 22 of the requirements for permit unit (S-1326-35-3)
- Condition 7 from the PTO was included as condition 23 of the requirements for permit unit (S-1326-35-3)

**a. 13 Uncontrolled Cyclic Oil Wells (S-1326-36-1)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 22 of the facility wide permit. Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-36-1)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-36-1)

**1.1 PETROLEUM STORAGE TANKS**

**a. Fixed Roof Storage Tanks (S-1326-92-1 through -95-1, '101-1 through -104-1, '111-1, '112-1, '113-1, '119-1 through '183-1, '186-1 through '194-1, '241-1 through '245-1, '273-1)**

These units were subject to the District NSR Rule at the time the applicant applied for Authorities to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTOs was not included in the requirements for these permit units. This condition refers to the facility-wide requirements and is extraneous.

**a. Fixed Roof Storage Tank (S-1326-37-1)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the

resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 7 of the requirements for permit unit (S-1326-37-1).
- Condition 2 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-37-1)

**a. Fixed Roof Storage Tank with Vapor Recovery (S-1326-46-2)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-46-2).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-46-2).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-46-2).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-46-2).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-46-2).
- Condition 6 from the PTO was included as condition 6 of the requirements for permit unit (S-1326-46-2).
- Condition 7 from the PTO was included as condition 7 of the requirements for permit unit (S-1326-46-2).
- Condition 8 from the PTO was included in condition 8 of the requirements for permit unit (S-1326-46-2).
- Condition 9 from the PTO was included as condition 9 of the requirements for permit unit (S-1326-46-2).
- Condition 10 from the PTO was included in condition 10 of the requirements for permit unit (S-1326-46-2). This condition was revised to include the definition of gas-tight condition.
- Condition 11 from the PTO was included in condition 11 of the requirements for permit unit (S-1326-46-2).
- Condition 12 from the PTO was included as condition 12 of the requirements for permit unit (S-1326-46-2).

- Condition 13 from the PTO was included as condition 13 of the requirements for permit unit (S-1326-46-2).
- Condition 14 from the PTO was included as condition 14 of the requirements for permit unit (S-1326-46-2).
- Condition 15 from the PTO was included in condition 15 of the requirements for permit unit (S-1326-46-2). The records of daily throughput shall be kept to assure ongoing compliance.

**a. Fixed Roof Storage Tank with Vapor Recovery (S-1326-47-2, '48-2, and '214-4)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).
- Condition 2 from the PTO was included as condition 2 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).
- Condition 3 from the PTO was included as condition 3 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).
- Condition 4 from the PTO was included as condition 4 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).
- Condition 5 from the PTO was included in condition 5 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).
- Condition 6 from the PTO was included as condition 6 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).
- Condition 7 from the PTO was included in condition 7 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).
- Condition 8 from the PTO was included in condition 8 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).

- Condition 9 from the PTO was included as condition 9 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).
- Condition 10 from the PTO was included as condition 10 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).
- Condition 11 from the PTO was included as condition 11 of the requirements for these permit units (S-1326-47-2, '48-2, and '214-4).

**a. Fixed Roof Wash Tank with Vapor Recovery (S-1326-201-5)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-201-6 was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 1 of the requirements for permit unit (S-1326-201-5). Permit units S-1326-110 and -111 were cancelled and therefore, these units are not included in this condition.
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-201-5).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-201-5).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-201-5).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-201-5).
- Condition 6 from the PTO was included as condition 6 of the requirements for permit unit (S-1326-201-5).
- Condition 7 from the PTO was included as condition 7 of the requirements for permit unit (S-1326-201-5).
- Condition 8 from the PTO was included as condition 8 of the requirements for permit unit (S-1326-201-5).
- Condition 9 from the PTO was included as condition 9 of the requirements for permit unit (S-1326-201-5).
- Condition 10 from the PTO was included in condition 10 of the requirements for permit unit (S-1326-201-5).
- Condition 11 from the PTO was included in condition 11 of the requirements for permit unit (S-1326-201-5). The



record retention of 2 years is subsumed by more stringent Title V requirement of five years records retention.

**a. Fixed Roof Wash Tank with Vapor Recovery (S-1326-202-3, '203-4, '204-4, '206-3)**

These units were subject to the District NSR Rule at the time the applicant applied for Authorities to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs S-1326-202-2, '203-3, '204'3, and '206-4 were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTOs was included as condition 1 of the requirements for permit units S-1326-202-3, '203-4, '204-4, '206-3.
- Condition 2 from the PTOs was included as condition 2 of the requirements for permit units S-1326-202-3, '203-4, '204-4, '206-3.
- Condition 3 from the PTOs was included as condition 3 of the requirements for permit units S-1326-202-3, '203-4, '204-4, '206-3.
- Condition 4 from the PTOs was included as condition 4 of the requirements for permit units S-1326-202-3, '203-4, '204-4, '206-3.
- Condition 5 from the PTOs was included as condition 5 of the requirements for permit units S-1326-202-3, '203-4, '204-4, '206-3.
- Condition 6 from the PTOs was included in condition 6 of the requirements for permit units S-1326-202-3, '203-4, '204-4, '206-3.
- Condition 7 from the PTOs was included in condition 7 of the requirements for permit units S-1326-202-3, '203-4, '204-4, '206-3.
- Condition 8 from the PTOs was included in condition 8 of the requirements for permit units S-1326-202-3, '203-4, '204-4, '206-3. The record retention of 2 years is subsumed by more stringent Title V requirement of five years records retention.

**a. Fixed Roof Tanks with Vapor Recovery (S-1326-205-3 and '212-4)**



This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs S-1326-205-2 and '212-3 addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit units (S-1326-205-3 and '212-4).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit units (S-1326-205-3 and '212-4).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit units (S-1326-205-3 and '212-4).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit units (S-1326-205-3 and '212-4).
- Condition 5 from the PTO was included in condition 5 of the requirements for permit units (S-1326-205-3 and '212-4).
- Condition 6 from the PTO was included in condition 6 of the requirements for permit units (S-1326-205-3 and '212-4).
- Condition 7 from the PTO was included in condition 7 of the requirements for permit units (S-1326-205-3 and '212-4). The record retention of 2 years is subsumed by more stringent Title V requirement of five years records retention.

**a. Fixed Roof Wash Tanks with Vapor Recovery (S-1326-215-4)**

These units were subject to the District NSR Rule at the time the applicant applied for Authorities to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-215-3 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was not included in the requirements for permit unit (S-1326-215-4). This condition is redundant to condition 5 of this permit unit.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit units (S-1326-215-4).
- Condition 3 from the PTO was included as condition 2 of the requirements for permit units (S-1326-215-4).
- Condition 4 from the PTO was included as condition 3 of the requirements for permit units (S-1326-215-4).
- Condition 5 from the PTO was included as condition 4 of the requirements for permit units (S-1326-215-4).
- Condition 6 from the PTO was included as condition 5 of the requirements for permit units (S-1326-215-4).
- Condition 7 from the PTO was included as condition 6 of the requirements for permit units (S-1326-215-4).
- Condition 8 from the PTO was included in condition 7 of the requirements for permit units (S-1326-215-4).
- Condition 9 from the PTO was included as condition 8 of the requirements for permit units (S-1326-215-4).
- Condition 10 from the PTO was included as condition 9 of the requirements for permit units (S-1326-215-4).
- Condition 11 from the PTO was included as condition 10 of the requirements for permit units (S-1326-215-4).
- Condition 12 from the PTO was included as condition 11 of the requirements for permit units (S-1326-215-4).
- Condition 13 from the PTO was included in condition 12 of the requirements for permit units (S-1326-215-4).

**a. Fixed Roof Stock Tank with Vapor Control (S-1326-261-3)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-261-2 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-261-3).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-261-3).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-261-3).

- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-261-3).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-261-3).
- Condition 6 from the PTO was included in condition 6 of the requirements for permit unit (S-1326-261-3).
- Condition 7 from the PTO was included in condition 7 of the requirements for permit unit (S-1326-261-3).
- Condition 8 from the PTO was included in condition 8 of the requirements for permit unit (S-1326-261-3). The record retention of 2 years is subsumed by condition 9 of the facility wide requirements requiring 5 years for Title V compliance.

**a. Fixed Roof Stock Tank with Vapor Control (S-1326-262-2)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-262-1 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 40 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-262-2).
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-262-2).
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-262-2).
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-262-2).
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-262-2).
- Condition 7 from the PTO was included in condition 6 of the requirements for permit unit (S-1326-262-2).
- Condition 8 from the PTO was included in condition 7 of the requirements for permit unit (S-1326-262-2).

- Condition 9 from the PTO was included in condition 8 of the requirements for permit unit (S-1326-262-2). The record retention of 2 years is subsumed by condition 9 of the facility wide requirements requiring 5 years for Title V compliance.

**a. Fixed Roof Surge Tank with Vapor Control (S-1326-263-2)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-263-1 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-263-2).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-263-2).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-263-2).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-263-2).
- Condition 5 from the PTO was included in condition 5 of the requirements for permit unit (S-1326-263-2).
- Condition 6 from the PTO was included in condition 6 of the requirements for permit unit (S-1326-263-2).
- Condition 7 from the PTO was included as condition 7 of the requirements for permit unit (S-1326-263-2). The record retention of 2 years is subsumed by condition 9 of the facility wide requirements requiring 5 years for Title V compliance.

**a. Fixed Roof Surge Tank with Vapor Control (S-1326-268-3)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-268-2 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-268-3).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-268-3).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-268-3).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-268-3).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-268-3).
- Condition 6 from the PTO was included in condition 6 of the requirements for permit unit (S-1326-268-3).
- Condition 7 from the PTO was included in condition 7 of the requirements for permit unit (S-1326-268-3).
- Condition 8 from the PTO was included as condition 8 of the requirements for permit unit (S-1326-268-3). The record retention of 2 years is subsumed by condition 9 of the facility wide requirements requiring 5 years for Title V compliance.

**a. Fixed Roof Produced Water Tank with Vapor Control (S-1326-269-3)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-269-2 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-269-3).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-269-3).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-269-3).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-269-3).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-269-3).
- Condition 6 from the PTO was included in condition 6 of the requirements for permit unit (S-1326-269-3).

- Condition 7 from the PTO was included in condition 7 of the requirements for permit unit (S-1326-269-3).
- Condition 8 from the PTO was included as condition 8 of the requirements for permit unit (S-1326-269-3). The record retention of 2 years is subsumed by condition 9 of the facility wide requirements requiring 5 years for Title V compliance.

**a. Fixed Roof Oil Treating Tank with Vapor Control (S-1326-270-2)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-270-1 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-270-2).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-270-2).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-270-2).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-270-2).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-270-2).
- Condition 6 from the PTO was included in condition 6 of the requirements for permit unit (S-1326-270-2).
- Condition 7 from the PTO was included in condition 7 of the requirements for permit unit (S-1326-270-2).
- Condition 8 from the PTO was included in condition 8 of the requirements for permit unit (S-1326-270-2). The record retention of 2 years is subsumed by condition 9 of the facility wide requirements requiring 5 years for Title V compliance.

**a. Fixed Roof Dehydration Tank with Vapor Control (S-1326-271-2)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70

Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-271-1 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-271-2).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-271-2).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-271-2).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-271-2).
- Condition 5 from the PTO was included in condition 5 of the requirements for permit unit (S-1326-271-2).
- Condition 6 from the PTO was included in condition 6 of the requirements for permit unit (S-1326-271-2).
- Condition 7 from the PTO was included as condition 7 of the requirements for permit unit (S-1326-271-2). The record retention of 2 years is subsumed by condition 9 of the facility wide requirements requiring 5 years for Title V compliance.

**a. Fixed Roof Water Tank with Vapor Control (S-1326-272-2)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-272-1 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-272-2).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-272-2).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-272-2).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-272-2).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-272-2).



- Condition 6 from the PTO was included in condition 6 of the requirements for permit unit (S-1326-272-2).
- Condition 7 from the PTO was included in condition 7 of the requirements for permit unit (S-1326-272-2).
- Condition 8 from the PTO was included in condition 8 of the requirements for permit unit (S-1326-272-2). The record retention of 2 years is subsumed by condition 9 of the facility wide requirements requiring 5 years for Title V compliance.

**a. Fixed Roof Slop Oil Tank with Vapor Control (S-1326-274-1)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-274-0 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1326-274-1).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1326-274-1).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1326-274-1).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1326-274-1).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1326-274-1).
- Condition 6 from the PTO was included in condition 6 of the requirements for permit unit (S-1326-274-1).
- Condition 7 from the PTO was included in condition 7 of the requirements for permit unit (S-1326-274-1).
- Condition 8 from the PTO was included in condition 8 of the requirements for permit unit (S-1326-274-1). The record retention of two years was not included. It is subsumed by the more stringent condition of the facility wide requirements requiring records must be kept for at least five years.

**a. Fixed Roof Storage Tank (S-1326-276-1, '277-1)**



These units were subject to the District NSR Rule at the time the applicant applied for Authorities to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs S-1326-276-0 and '277-0 was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 18 of the requirements for permit units (S-1326-276-1, '277-1). This condition refers to the facility-wide requirements and is extraneous.
- Condition 2 from the PTO was included as condition 1 of the requirements for these permit units (S-1326-276-1, '277-1).

**a. Wash Tank (S-1326-279-1)**

These units were subject to the District NSR Rule at the time the applicant applied for Authorities to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO S-1326-279-0 addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was not included in the requirements for permit unit (S-1326-279-1). This condition refers to the facility-wide requirements and is extraneous.
- Condition 2 from the PTO was obsolete and was not included in the requirements for permit units (S-1326-279-1).

**1.1 MISCELLANEOUS EQUIPMENTS**

**a. Flare (S-1326-260-2)**

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 40 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO was included as condition 1 of the requirements for this permit unit.
- Condition 3 from the PTO was included as condition 2 of the requirements for this permit unit.
- Condition 4 from the PTO was included as condition 3 of the requirements for this permit unit.
- Condition 5 from the PTO was included as condition 4 of the requirements for this permit unit.
- Condition 6 from the PTO was included as condition 5 of the requirements for this permit unit.
- Condition 7 from the PTO was included as condition 6 of the requirements for this permit unit.
- Condition 8 from the PTO was included as condition 7 of the requirements for this permit unit. The part requiring 2 year record retention was not included since it is subsumed by more stringent condition of the facility wide requirements requiring all records shall be kept for five years.

2. **District Rule 1081 Source Sampling (Amended December 16, 1993)**

District Rule 1081 has been submitted to the EPA to replace Kern County Rule 108.1, which is SIP approved. District Rule 1081 is as stringent as Kern County Rule 108.1, as shown on Table 1.

**Table 1 ' Comparison of District Rule 1081 and Kern County Rule 108.1**

<b>REQUIREMENTS</b>	<b>1081 SJVUAPCD</b>	<b>108.1 KERN</b>
Upon request of the APCO, the source shall provide info. and records to enable the APCO to determine when a representative sample can be taken.	✓	✓
The facility shall collect, have collected or allow the APCO to collect, a source sample	✓	✓
The source shall have District personnel present at a source test	✓	
The applicable test method, if not specified in the rule, shall be conducted in accordance with 40 CFR § 60, Appendix A	✓	
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator control occurs.	✓	

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 of Rule 1081 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively.

The table below shows conditions on permit units assuring compliance with these requirements.

<b>Permit units</b>	<b>Conditions</b>
S-1326-26-5, -27-8, -28-9, -35-3	3
S-1326-201-5	10

**2. District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995), Sections 9.1, 9.4.2, 9.5.2**

Section 9.1 of the rule requires operational requirements and limitations to assure compliance with all applicable requirements.

Section 9.4.2 of the rule requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance.

Section 9.5.2 of the rule requires that records of all required monitoring data and support information be retained for a period of at least five years from the date of the monitoring sample, measurement, or report.

**a. Natural Gas Fired Steam Generators and Heater Treaters (S-1326-9-7, '10-7, '12-7, '13-7, '29-6, '31-8, '32-8, '33-7, '257-2)**

These steam generators and heater treaters at Kern Front oil field of Oxy USA Inc. have been and will be designated as dormant units. Condition 1 is added to the requirement of their permits requiring that the application for Title V modification will be required prior to the operation of these steam generators.

**b. Liquid Petroleum Storage tanks**

The storage tanks are required to demonstrate that the true vapor pressure (TVP) of the liquid stored shall not exceed the limits specified on the permit. Periodic testing and recordkeeping are added to the permits assuring an ongoing compliance. Compliance is assured by condition 1-6 of permit units S-1326-37-1, -92-1 thru -95-1, -101-1 thru -104-1, -111-1 thru -113-1, -119-1 thru -149-1, -151-1 thru -173-1, -182-1, -183-1, -186-1 thru 4-1, -234-1, -237-1, -239-1, -241-1 thru -245-1, -273-1, conditions 1-4 of permit units S-1326-235-1 and -236-1, conditions 2-7 of permit units S-1326-276-1, -277-1, and -279-1.

**c. Fixed Roof Storage Tank with Vapor recovery System**

These tanks are equipped with the vapor recovery systems and required which required to be inspected and maintained in a good operating at all time. Any leaks or defects that were found shall be fixed and appropriately label according to the

requirement of Rule 4623. Periodic leaks inspection and monitoring include recordkeeping are added onto the permit to ensure an ongoing compliance with this rule.

PERMIT UNIT# S-1326	CONDITION
-46-2	16-23,28-30
-47-2, -48-2, -214-4, -215-4	12,24-26
-201-5	11-18,23-26
-202-3,-203-4, -204-4, -206-3	8-15,20-23
-205-3, -212-4	7-14,19-22
-263-2,-271-2,	7,9-15,20-23
-261-3-262-2, -268-3, -269-3, -270-2, -272-2	8,10-16,21-23
-274-1	8,9-15,20-22

**2. District Rule 4401 Steam-Enhanced Crude Oil Production Well Vents (Amended January 15, 1998)**

District Rule 4401 (amended January 15, 1998) is a renumbering of the requirements of SIP approved District Rule 465.1.

Section 4.5.1 requires any exempt well to be located more than 1000 feet from an existing well vent vapor control system operated by the company. Condition 3 is added to the permit unit S-1326-36-1 assuring compliance with the requirement of this section.

**3. District Rule 4623 Storage of Organic Liquids (Amended December 17, 1992)**

District Rule 4623 (adopted April 11, 1991, amended September 19, 1991, Amended December 17, 1992) is a renumbering of the requirements of SIP approved District Rule 463.2.

This rule applies to equipment used to store organic liquids with a true vapor pressure of greater than 1.5 psia, pursuant to section 2.0, Applicability. Requirements from section 5.0 apply only to floating or fixed roof organic liquid storage tanks with capacity of 19,800 gallons or greater and to gasoline storage tanks with 19,800 gallons or less capacity.

**a. Fixed Roof Organic Liquid Storage Tanks (permit units S-1326-191-1, '234-1 thru '239-1, '241-1 thru ' 245-1, and '273-1)**

These fixed roof storage tanks are used to store organic liquids with a TVP of 1.5 psia or less. Furthermore, these

organic liquid storage tanks each have a storage capacity of less than 19,800 gallons. According to District Rule 4623, Section 5.3.1, these tanks shall not subject to the requirements of this rule.

**b. Fixed Roof Organic Liquid Storage Tanks (Permit Units S-1326-37-1, '92-1 thru '95-1, '101-1 thru '104-1, '111-1 thru '113-1, '119-1 thru '173-1, '182-1, '183-1, '186-1 thru '194-1, '208-1, '234-1 thru '237-1, '239-1, '241-1 thru '245-1, '273-1, '276-1, '277-1, '279-1)**

These fixed roof organic liquid storage tanks each have a storage capacity of greater than 19,800 gallons but are exempted from the requirements of Rule 4623 since they are used to store liquid petroleum with the true vapor pressure less than 1.5 psia, as required on the permit to operate. However, to maintain exemption status, the operator shall keep the record of true vapor pressures to demonstrate that the tanks are having TVP < 1.5 and shall not subject to the requirement of section 5.0 of District Rule 4623. Conditions 2, 3, 4, and 5 of these units contain monitoring and testing requirements to assure the exemption status is maintained.

**c. Fixed Roof Organic Liquid Storage Tanks (Permit Units S-1326-55, '56, '236 through '240, '242, , '255, '256, '257, '259 through '263)**

These tanks are subject to the requirements of District Rule 4623 due to tank capacity and TVP of liquid stored. Even though, some of them are used to store petroleum liquid which has TVP < 1.5 psia, they are connected to a vapor control system. Hence, the requirements from Rule 4623 regarding vapor control system still apply.

This rule requires that all tanks with a storage capacity greater than 19,800 gallons, storing organic liquids with a true vapor pressure greater than or equal to 1.5 psia, have either a floating roof or vapor recovery system to control volatile organic compound (VOC) emissions. The petroleum storage tanks at this facility control VOC emissions by using an un-vented vapor recovery system. The vapor recovery system is listed on the equipment description of each unit.

Section 5.3.1 requires that any fixed roof tank with a storage capacity of 19,800 gallons or larger used to store any organic

liquid, light crude oil or petroleum distillate with a true vapor pressure greater than 1.5 psia be equipped with a vapor loss prevention system capable of collecting all VOCs. These units are also required to contain a system for processing and for return to liquid storage or disposal of VOCs, so as to prevent their emission to the atmosphere at an efficiency of at least 95 percent by weight. Conditions assure compliance with this requirements are shown in the following table:

Table 9.1 Condition specifying efficiency of vapor recovery system.

Permit Units	Conditions
S-1326-46-2, -201-5, -216-3	3
S-1326-202-3, -203-4, -204-4,-206-3, -274-1	13
S-1326-205-3, -212-4,	12
S-1326-47-2, -48-2, -214-4, -215-4,	2
S-1326-263-2, -271-2	8
S-1326-261-3, -262-2, -268-3, -269-3, -270-2, -272-2	9

*\*Conditions on the current ATC from these units require that the VOC control efficiency shall be at least 99% and therefore, subsume the 95% VOC control efficiency requirement of Rule 4623, Section 5.3.1.*

Section 5.3.2 and Section 5.3.3 require that any tank gauging or sampling device on a tank vented to the vapor recovery system be equipped with a gas-tight cover. This cover shall be closed at all times except during gauging or sampling. Additionally, all pipes, valves, and fittings be constructed and maintained in a gas tight condition. Compliance is assured by conditions demonstrated in the table on the next page.

Table 9.2 Conditions assuring compliance with Section 5.3.2 & 5.3.3 of Rule 4623

Permit Units	Conditions
S-1326-201-5, -216-3	8,9
S-1326-202-3, -203-4, -204-4,-206-3, -274-1, -261-3, -262-2, -268-3, -269-3, -270-2, -272-2	6,7
S-1326-205-3, -212-4, -263-2, -271-2	5,6
S-1326-214-4, -215-4,	7,8

Additional recordkeeping requirements from section 6.0 of District Rule 4623 are contained in conditions 7, 12, 20-23 of the requirements for permit unit S-1326-46-2, '47-2, '48-2; conditions 19-22 of the requirements for permit unit S-1326-201-5, '263-2, '271-2, '274-1; conditions 16 of the requirements for permit units S-1326-202-3, '203-4, 204-4, '206-3; conditions 15-18 of the requirements for permit units S-1326-205-3, '212-4; conditions 20-23 of the requirements

for permit unit S-1326-214-4, '215-4; conditions 17-20 of the requirements for permit units S-1326-261-3, '262-2, '268-3, '269-3, '270-2, '272-2;



## 9. District Rule 4801 Sulfur Compound

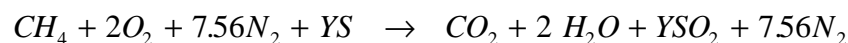
District Rule 4801 has been submitted to the EPA to replace Kern County Rule 407 which is in the SIP. District Rule 4801 is as stringent as Kern County Rule 407, as shown on Table 2.

**Table 2 - Comparison of District Rule 4801 and Kern County Rule 407**

REQUIREMENTS	4801 District	407 Kern
a person shall not discharge into the atmosphere sulfur compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.	✓	✓
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	✓	

### a. Flares (S-1326-26-5, '27-8, and '260-2)

Assuming that 0% excess air in the exhaust stream corresponds with maximum  $SO_x$  emissions concentration (neglecting  $NO_x$  and  $SO_x$  relative to  $SO_2$  in the exhaust) and that  $CH_4$  represents a typical gaseous fuel, the combustion equation is:



where:

Y = moles of sulfur in the fuel.

Solving an expression for the fraction of  $SO_2$  in the dry exhaust by volume gives:

$$\frac{Y}{1 + 7.56} = 0.002 \Rightarrow Y = 0.01712$$

where:

Y = mole fraction of S per mole of  $CH_4$  combusted

1 = one mole of  $CO_2$

7.56 = number of moles of  $N_2$

0.002 = 0.2% by volume = 2000 ppmv limit per County Rule 407

Use Y to calculate the weight fraction of S in one mole of  $CH_4$ :

$$\frac{(0.01712)(32.06)}{(16.04) + (0.01712)(32.06)} = 0.033 \Rightarrow 3.3\% \text{ S by weight in the fuel.}$$

where:

32.06 = molecular weight of sulfur (S)

16.04 = molecular weight of methane (CH<sub>4</sub>)  
0.033 = fraction of S by weight in the fuel

The preceding calculation shows that an exhaust concentration of 0.2% by volume corresponds to a gaseous fuel sulfur content by weight of 3.3%. These flares are permitted to burn gaseous fuel with the maximum sulfur content not greater than 1 gr/100 scf which is less than 3.3% by weight fuel sulfur content as demonstrated:

$$\left( \frac{1 \text{ grain S}}{100 \text{ scf}} \right) \left( \frac{23.8 \text{ scf}}{1 \text{ lb of NG}} \right) \left( \frac{1 \text{ lb}}{7,000 \text{ grains}} \right) = 0.000034 \frac{\text{lb S}}{1 \text{ lb of NG}} = 0.0034\% \ll 3.3\%$$

where:

$$\left( \frac{23.8 \text{ scf}}{1 \text{ lb of NG}} \right) = \text{Mass volume of natural gas (AP-42, Appendix A)}$$

As shown above, compliance with maximum fuel sulfur content of less than 1 grain/100scf shall be deemed compliance with the requirement of this rule. Conditions 19 and 25 of permit unit S-1326-26-5, conditions 19 and 27 of permit unit S-1326-27-8, conditions 13, 16 and 17 of permit unit S-1326-260-2 assure compliance with this requirement. Permittee is required to test the sulfur content of fuel gas incinerated on these flares periodically and keep the record for inspection to assure continue compliance with this requirement.

**9. 40 CFR 60, Subpart K Standards of Performance for Storage Vessels for Petroleum Liquids**

All the storage vessels for petroleum liquids located at Berry Petroleum Company's Western Heavy Oil Field are not subject to the requirement of these Subparts. Per affected facility definition, it does not include "storage vessel for petroleum liquids or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer". All petroleum liquid storage tanks at this facility are exempted from the requirements of 40 CFR 60 Subpart K, Subpart Ka, and Subpart Kb since these tanks store crude oil and petroleum liquids in production oil fields prior to custody transfer.

**10. 40 CFR Part 60.18 General Control Device Requirements**

**a. Flares (S-1326-26-5, '27-8, and '260-2)**

The Flares associated with the permit units above are not subject to the requirements of this subpart. Though the flares are used to incinerate vapors collected from organic liquid storage tanks and/or

wells, these wells and tanks are not subject to the requirements from NSPS. Therefore, the requirements of 40 CFR 60.18 are not applicable to the flares associated with the permit units S-1326-26-56, '-27-8, and '-260-2.

9. **40 CFR 63, Subpart HH Oil and Natural Gas Production MACT Standard**

The rule only applies to facilities in oil and natural gas (ONG) production. For the purposes of the rule, oil production is defined as hydrocarbon liquids production from the wellhead to the point of custody transfer (i.e., the sales point). Gas production is defined as from the wellhead up to and including the gas processing plant; after the processing plant, the natural gas is considered to be in the transmission and storage (T&S) category. If no processing plant is present, then the gas enters the T&S category after lease custody transfer. The ONG standards apply to facilities that major sources of HAPs and require controls on certain glycol dehydrators, storage vessels with flashing losses, and equipment leaks that exceed certain criteria such as throughputs, composition, or emissions.

This facility exclusively processes black oil, which is defined as API gravity less than 40 (API = 13, per applicant) and initial gas-to-oil ratio (GOR) less than 1,750 scf/bbl. (Initial GOR is defined as the producing GOR during the period when the reservoir pressure is above the bubble point pressure) Therefore, this facility is not subject to the requirements of this subpart.

10. **40 CFR Part 68 Chemical Accident Prevention Provisions**

The requirements of this provision mandate that a subject facility submit a Risk Management Plan to the proper authority. Condition 40 of the facility wide requirements (S-1326-0-1) requires compliance with this provision.

## **X. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source complies with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### **A. Requirements Addressed by Model General Permit Templates**

By using the model general permit templates listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the templates. The basis for each permit shield is discussed in the Permit Shield section of each template.

Condition4 through 6 have been added to the permit unit S-1326-36-1. These conditions grant permit shields for this unit since the applicant has Final to utilize SJV-WV-1-1. However, the unit is an uncontrolled cyclic well vent, therefore, the template is not applicable and the shields are granted from the requirements of District Rule 4401, Rule 4407 and Kern County Rule 108.1.

## **XI. PERMIT CONDITIONS**

See final permit conditions beginning on the following page.

G:\Per\Title \Eval\Oilfield\S1326 OXY U.S.A., Inc. (Heavy Oil Central)

**ATTACHMENT A**

**DETAILED FACILITY PRINTOUT**

## **ATTACHMENT B**

### **INSIGNIFICANT ACTIVITIES OR EQUIPMENT**

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities.

Exemption Category	Rule 2020 Citation	
Structure or incinerator associated with a structure designed as a dwelling for 4 families or less.	4.2.3	
Use of less than 2 gal/day of graphic arts materials.	5.4	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	5.1.1	✓
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	5.1.2	✓
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less.	5.1.3	
Space heating equipment other than boilers.	5.1.4	✓
Locomotives, airplanes, and watercraft used to transport passengers or freight.	5.2	
Cooling towers with a circulation rate less than 10,000 gal/min.	5.3	✓
Equipment at retail establishments used to prepare food for human consumption.	5.5.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	5.5.2	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plasticizer or blowing agent is used.	5.6	
Containers used to store clean produced water.	5.7.1	✓
Containers ≤100 bbl used to store oil with specific gravity ≥ 0.8762.	5.7.2	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762.	5.7.3	
Brazing, soldering, or welding equipment.	5.10.1	✓
Fugitive emissions sources associated with exempt equipment.	5.10.3	✓
Equipment used to compress natural gas.	5.10.2	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature < 50 F.	5.7.4	✓
Containers used to store unheated organic material with an initial boiling point ≥ 302 F.	5.7.5	✓
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ .9042.	5.7.6	✓
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251.	5.7.7	✓
Containers used to store refined lubricating oils.	5.7.8	✓
<b>Exemption Category</b>	<b>Rule 2020 Citation</b>	
Unvented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	5.7.9 or 5.10.4	✓
Portable tanks used exclusively to store produced fluids for ≤ six months.	5.7.10	
Mobile transport tanks on vehicles for delivery of VOCs.	5.7.11	
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251.	5.8.1.1	
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762.	5.8.1.2	
Equipment used to apply architectural coatings.	5.9.1	✓
Equipment used exclusively for the transfer of refined lubricating oil.	5.8.2	
Unheated, non-conveyorized degreasers < 10 ft <sup>2</sup> open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr evaporative losses.	5.9.2	✓
Pits and Ponds as defined in Rule 1020.	5.10.6	✓
Non-structural repairs & maintenance to permitted equipment.	4.2.6	✓
Emissions less than 2 lb/day from units not included above.	4.2.1	✓



# **ATTACHMENT C**

## **CURRENT ATCs AND PTOs**

**ATTACHMENT D**  
**EPA AND PUBLIC COMMENTS**

## **DISTRICT'S RESPONSES TO EPA COMMENTS FOR OXY U.S.A., Inc. (S-1326)**

In response to the comments letter dated May 17, 2001 from Oxy U.S.A., Inc. and the telephone conversation between the District and EPA (Mark Simms), the District has come to the following conclusions.

### **Facility Comment**

The facility stated that the flares associated with permit units S-1326-26-5, '-27-8, and '-260-2 are not subject to the requirements of 40 CFR 60.18 – General Provision for Control Equipment since these flares are used to incinerated vapor from non-NSPS sources. Therefore, Oxy U.S.A., Inc. requested that the requirements from 40 CFR 60.18 be removed from the permit conditions.

### **District Response**

Per telephone conversation between District and EPA (Mark Simms), EPA has agreed that the requirements from the general provision for control equipment, Subpart 60.18 of 40 CFR, shall not apply to the flares at this facility. Therefore, the requirements referencing 40 CFR 60.18 shall be deleted.

However, the facility will be required to perform visible emissions inspection on a bi-weekly basis. Method 9 shall be conducted within 72 hours if visible emissions continue after an appropriate action was taken to correct the visible emissions.

## Title V Facility Contacts

Created On (Date):

12/15/99

For (Facility name):  
(DBA ID Number):

Oxy USA, Inc.  
S-1326

By (District Staff Person):

Pardorn Nutprasasn

Based on Information Provided by:

Armando Gonzalez

### Responsible Official

Name:

Wesley Scott

Title:

Manager – Heavy Oil Team

Telephone:

(661) 763-6070

Address

PO Box 1002

Address:

Tupman, CA 93726-1002

### Contacts for Questions Regarding Application

Name:

Armando Gonzalez

Title:

Environmental Advisor

Telephone:

(661) 763-6058

FAX:

Will give new #

### Send Final Permits to:

Name:

Armando Gonzalez

Title:

Environmental Advisor

Telephone:

(661) 763-6058

FAX:

Will give new #

Address:

PO Box 1002

Tupman, CA 93726-1002

### Send Final and Final Permits to:

Name:

Armando Gonzalez

Title:

Environmental Advisor

Telephone:

(661) 763-6058

FAX:

Will give new #

Address:

PO Box 1002

Tupman, CA 93726-1002

## **Steam Generators and Process Heaters**

## **Liquid Petroleum Storage Tanks**

## **Thermally Enhanced Well Vents**

## **Miscellaneous Equipment**



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